

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TAMMY JO LONG, an Illinois resident, and)	
LUXURY PROPERTIES LLC,)	Case No. 17-cv-02756
)	
Plaintiffs,)	Judge Jorge L. Alonso
vs.)	
)	Magistrate Judge Young B. Kim
BANK OF AMERICA, N.A.,)	
)	
Defendant.)	

**JOINT MOTION TO FILE EXHIBIT A TO PROPOSED
JOINT STIPULATED DISMISSAL ORDER UNDER SEAL**

Plaintiffs Tammy Jo Long and Luxury Properties LLC (collectively, “Plaintiffs”), and Defendant Bank of America, N.A. (“Defendant”), by and through their undersigned counsel, hereby submit their Joint Motion to File Exhibit A to Proposed Joint Stipulated Dismissal Order Under Seal. In support of this Motion, the parties state as follows:

1. Plaintiffs filed their Complaint in this action on April 11, 2017. [Dkt. No. 1.]
2. On or about December 17, 2018, the Parties executed a Settlement Agreement and Release (“Settlement Agreement”) to resolve this matter.
3. The Parties have agreed that the Settlement Agreement is confidential.
4. The Parties have also agreed that the terms of the Settlement Agreement be incorporated into the Stipulation of Dismissal.
5. In order to comply with both of these provisions of the Settlement Agreement, the Parties request that this Court allow them to file the proposed Joint Stipulated Dismissal Order publicly, with the Settlement Agreement attached as Exhibit A under seal.
6. That is, the Parties request that only the Settlement Agreement itself be filed under seal.

7. In accordance with Local Rule 26.2(2), the Parties have provisionally filed the Exhibit A to the proposed Joint Dismissal Order under seal, publicly filed the proposed Joint Stipulated Dismissal Order without the attached Exhibit A, and simultaneously filed this motion for leave to file Exhibit A under seal.

8. The Parties also request that the Court enter the proposed Joint Stipulated Dismissal Order with Exhibit A filed under seal as an attachment to that order.

WHEREFORE, the Parties jointly respectfully request that this Court enter an order allowing them to file Exhibit A to the proposed Joint Stipulated Dismissal Order under seal, that the Court enter the Joint Stipulated Dismissal Order with Exhibit A filed under seal, and grant all other just relief.

Dated: December 19, 2018

Respectfully submitted,

By: /s/ Bevin Brennan

-and-

By: /s/ David Pustilnik

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